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SEMS DocID

2246791

ORIGINAL

TELEX: 3725535 (GNET)

October 9, 1986

Mr. Jack Kelly  
U.S. EPA  
Region III  
841 Chestnut Bldg  
Philadelphia, PA 19107

Dear Mr. Kelly:

I represent Metro Container, one of the parties who originally received correspondence from Judith Dorsey with regard to the Douglassville Site. A copy of my response to her a year ago is enclosed.

I understand that you are now dealing with this site, and are engaged in deliberations that include the petroleum exception to CERCLA's definition of a hazardous substance. Relevant to those discussions, I wanted to reiterate that the material given to Angelo Rose by Metro Container was virgin oil.

Metro Container is a steel drum reconditioner. Lube oil drums are sent to Metro for cleaning and restoration. They contain small residues of unused virgin oil. Metro then and now drains these drums before reconditioning them. The oil drained from these drums is segregated from residues that might be in other drums, and is kept in a separate tank. This is the oil that was taken from Metro's site by Mr. Rose.

I hope this information is helpful to you in assessing the relative hazards of materials involved in this proceeding. Please contact me if you have any questions on this.

Very truly yours,

Lawrence W. Bierlein

cc: Jim Hennahan  
Sandra Rennie